

Facility ID: 0285000393 Issuance type: Final State Permit To Operate

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part II" and before "A. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

[Go to Part II for Emissions Unit R001](#)

[Go to Part II for Emissions Unit R002](#)

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Facility ID: 0285000393 Emissions Unit ID: R001 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

**Part II - Special Terms and Conditions**

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
  - (a) None.

**A. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
spray paint booth no. 1 - JBI Model 390260 for applying sealer and top-coat to wood furniture	OAC rule 3745-31-05(A)(3) (PTI 02-12533)	Organic compounds (OC) emissions shall not exceed 7.3 tons per year.
	OAC rule 3745-21-07(G)(2)	On any day when any photochemically reactive materials are employed, OC emissions shall not exceed 8 lbs/hr and 40 lbs/day from all coatings and photochemically reactive cleanup materials employed in this unit.

2. **Additional Terms and Conditions**
  - (a) None

**B. Operational Restrictions**

1. All exhaust from the spray booth shall pass through the dry filters whenever this emissions unit is in operation.

**C. Monitoring and/or Record Keeping Requirements**

1. The permittee shall collect and record the following information for each day the emissions unit operates:
  - a. the company identification for each coating and photochemically reactive cleanup material employed and a determination as to whether or not each coating is a photochemically reactive material as defined in OAC rule 3745-21-01;
  - b. the number of gallons of each coating and photochemically reactive cleanup material employed;
  - c. the OC content of each coating and photochemically reactive cleanup material employed, in lbs/gal;
  - d. the total OC emission rate for all coatings and photochemically reactive cleanup materials employed, in lbs/day (summation of b x c for each coating employed);
  - e. the total number of hours the emissions unit operated; and
  - f. the average hourly OC emission rate for all coatings and photochemically reactive cleanup materials employed, in lbs/hr (d / e).
2. The permit to install for emissions units R001 and R002 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: xylene

TLV (mg/m3): 434

Maximum Hourly Emission Rate (lbs/hr): 0.95  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1,828  
 MAGLC (ug/m3): 10,333

Pollutant: ethanol  
 TLV (mg/m3): 1,880  
 Maximum Hourly Emission Rate (lbs/hr): 0.16  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1,219  
 MAGLC (ug/m3): 44,760

Pollutant: n-butyl acetate  
 TLV (mg/m3): 713  
 Maximum Hourly Emission Rate (lbs/hr): 0.56  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1,067  
 MAGLC (ug/m3): 16,980

3. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

4. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

**D. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify each day when any of the emission limits in section A.1 of these terms and conditions were exceeded.

The quarterly deviations reports shall be submitted in accordance with the General Terms and Conditions. These reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

2. The permittee shall submit annual reports that specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31st of each year.

**E. Testing Requirements**

1. Compliance with the emission limitations specified in section A.1 of these terms and conditions shall be determined in accordance with the following methods:  
 Emission Limitations:

OC emissions shall not exceed 8 lbs/hr, 40 lbs/day and 7.3 tons/yr from all coatings and photochemically reactive cleanup materials employed in this emissions unit.

Applicable Compliance Methods:

Compliance with the hourly and daily OC emission limitations shall be determined by the record keeping requirements specified in section C.1 of these terms and conditions.

The tpy emission limitation was developed by multiplying the daily short-term allowable particulate emission limitation (40 lbs/day) by the maximum annual days of operation (365 days), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the daily short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

**F. Miscellaneous Requirements**

1. If the facility becomes a major source for hazardous air pollutants (HAPs) as defined in 40 CFR 63.2 (Subpart A), and cannot meet the exemptions specified in 40 CFR 63.800 (Subpart JJ), this facility must comply with the requirements for a major source pursuant to 40 CFR Part 63, Subpart JJ immediately after the exceedance. A listing of HAPs can be found in Section 112 (b) of the Clean Air Act or can be obtained by contacting the Ohio EPA Northeast District Office.

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Facility ID: 0285000393 Emissions Unit ID: R002 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

**Part II - Special Terms and Conditions**

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1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
  - (a) None.

**A. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
spray paint booth no. 2 - JBI Model 390260 for applying stains and varnishes to wood furniture	OAC rule 3745-31-05(A)(3) (PTI 02-12533)	Organic compounds (OC) emissions shall not exceed 7.3 tons per year.
	OAC rule 3745-21-07(G)(2)	On any day when any photochemically reactive materials are employed, OC emissions shall not exceed 8 lbs/hr and 40 lbs/day from all coatings and photochemically reactive cleanup materials employed in this unit.

**2. Additional Terms and Conditions**

- (a) None

**B. Operational Restrictions**

1. All exhaust from the spray booth shall pass through the dry filters whenever this emissions unit is in operation.

**C. Monitoring and/or Record Keeping Requirements**

1. The permittee shall collect and record the following information for each day the emissions unit operates:
  - a. the company identification for each coating and photochemically reactive cleanup material employed and a determination as to whether or not each coating is a photochemically reactive material as defined in OAC rule 3745-21-01;
  - b. the number of gallons of each coating and photochemically reactive cleanup material employed;
  - c. the OC content of each coating and photochemically reactive cleanup material employed, in lbs/gal;
  - d. the total OC emission rate for all coatings and photochemically reactive cleanup materials employed, in lbs/day (summation of b x c for each coating employed);
  - e. the total number of hours the emissions unit operated; and
  - f. the average hourly OC emission rate for all coatings and photochemically reactive cleanup materials employed, in lbs/hr (d / e).
2. The permit to install for emissions units R001 and R002 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

## Pollutant: xylene

TLV (mg/m3): 434  
 Maximum Hourly Emission Rate (lbs/hr): 0.95  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1,828  
 MAGLC (ug/m3): 10,333

## Pollutant: ethanol

TLV (mg/m3): 1,880  
 Maximum Hourly Emission Rate (lbs/hr): 0.16  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1,219  
 MAGLC (ug/m3): 44,760

## Pollutant: n-butyl acetate

TLV (mg/m3): 713  
 Maximum Hourly Emission Rate (lbs/hr): 0.56  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1,067  
 MAGLC (ug/m3): 16,980

3. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
- changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
  - changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
  - physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
4. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

- a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- documentation of the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

**D. Reporting Requirements**

- The permittee shall submit quarterly deviation (excursion) reports that identify each day when any of the emission limits in section A.1 of these terms and conditions were exceeded.  
  
The quarterly deviations reports shall be submitted in accordance with the General Terms and Conditions. These reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.
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**E. Testing Requirements**

- Compliance with the emission limitations specified in section A.1 of these terms and conditions shall be determined in accordance with the following methods:  
Emission Limitations:  
  
OC emissions shall not exceed 8 lbs/hr, 40 lbs/day and 7.3 tons/yr from all coatings and photochemically reactive cleanup materials employed in this emissions unit.  
  
Applicable Compliance Methods:  
  
Compliance with the hourly and daily OC emission limitations shall be determined by the record keeping requirements specified in section C.1 of these terms and conditions.  
  
The tpy emission limitation was developed by multiplying the daily short-term allowable particulate emission limitation (40 lbs/day) by the maximum annual days of operation (365 days), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the daily short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

**F. Miscellaneous Requirements**

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